

SCANNED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SAREGAMA INDIA LTD.,

07-CV-7601 (VM)

Plaintiff,

-against-

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

JAYCEON TAYLOR p/k/a THE GAME,  
TIMOTHY MOSLEY p/k/a TIMBALAND,  
NATE HILLS, AFTERMATH ENTERTAINMENT,  
G UNIT RECORDS, INTERSCOPE RECORDS,  
CZAR ENTERTAINMENT, UNIVERSAL MUSIC  
GROUP, UNIVERSAL MUSIC AND VIDEO  
DISTRIBUTION, INC., BLACK WALL STREET,  
EACH 1 TEACH 1, VIRGINIA BEACH MUSIC,  
WB MUSIC CORP. and DANJA HANDZ MUZICK,

Defendants.  
-----X

TO: Seth Alan Levine  
Richman & Levine, P.C.  
666 Old Country Road  
Suite 101  
Garden City, NY 11530  
slevine@richmanlevin.com  
(516) 228-9444

Carletta F. Higginson  
Jenner & Block LLP  
919 Third Avenue, 37<sup>th</sup> Floor  
New York, New York 10022  
chigginson@jenner.com  
(212) 891-1624

PLEASE TAKE NOTICE that upon the annexed affidavit of movant Alan S. Hock in support of this motion, the declaration of Karen L. Stetson in support of this motion and the Certificate of Good Standing annexed hereto, we move this Court before the Honorable Victor Marrero, United States District Judge, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New

11-14-07 9

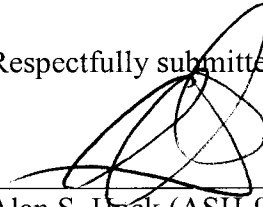
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York for an Order allowing the admission of the applicant, Karen L. Stetson, a member of the Law Offices of Karen L. Stetson, Esq. and a member in good standing of the Bar of the State of Florida, as attorney Pro Hac Vice to argue or try this case in whole or in part as counsel for defendant, Timothy Mosley p/k/a Timbaland, and defendant, G-Unit Records, Inc. (incorrectly identified herein as "G Unit Records"). There are no pending disciplinary proceedings against movant, Karen L. Stetson, in any State or Federal court.

Dated: November 13, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alan S. Hock', is written over a horizontal line.

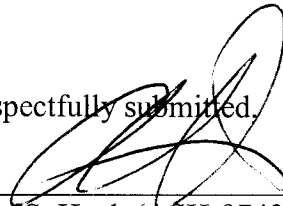
Alan S. Hock (ASH-9743)  
MORITT HOCK HAMROFF &  
HOROWITZ LLP  
400 Garden City Plaza  
Garden City, New York 11530  
mcardello@moritthock.com  
(516) 873-2000

2. I am a member of good standing of the bar of the State of New York, and was admitted to practice law in October, 1982. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Karen L. Stetson since October, 2006.
4. Ms. Stetson is a member of the Law Offices of Karen L. Stetson, Esq., in Miami, Florida.
5. I have found Ms. Stetson to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move for the admission of Karen L. Stetson, Pro Hac Vice.
7. I respectfully submit a proposed order granting the admission of Karen L. Stetson, Pro Hac Vice, which is attached hereto as Exhibit "B".

WHEREFORE, it is respectfully requested that the motion to admit Karen L. Stetson, Pro Hac Vice, to argue or try this case in whole or in part as counsel for defendant, Timothy Mosley p/k/a Timbaland, and defendant, G-Unit Records, Inc., be granted.

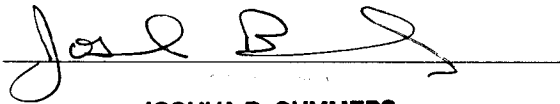
Dated: November 13, 2007

Respectfully submitted,



Alan S. Hock (ASH-9743)  
MORITT HOCK HAMROFF &  
HOROWITZ LLP  
400 Garden City Plaza  
Garden City, New York 11530  
ahock@moritthock.com  
(516) 873-2000

Sworn to before me this  
13 day of November, 2007



**JOSHUA B. SUMMERS**  
**Notary Public, State of New York**  
**No. 02SU6124368**  
**Qualified in Nassau County**  
**Commission Expires 03/28/2009**

UNITED STATES DISTRICT COURT  
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SAREGAMA INDIA LTD.,

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-against-

JAYCEON TAYLOR p/k/a THE GAME,  
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WB MUSIC CORP. and DANJA HANDZ MUZICK,

Defendants.  
-----X

07-CV-7601 (VM)

**DECLARATION OF  
KAREN L. STETSON  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

State of Florida                    )  
  )     ss:  
County of Miami-Dade            )

I hereby declare under penalty of perjury as follows:

1. I am a member of the Law Offices of Karen L. Stetson, Esq.
2. I submit this declaration in support of the motion for admission to practice


Pro Hac Vice in the above captioned matter.

3. As shown in the Certificate of Good Standing annexed hereto as Exhibit  
“A”, I am a member in good standing of the Bar of the State of Florida.

4. There are no pending disciplinary proceedings against me in any State or  
Federal court.

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

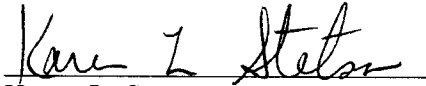
Executed this 9<sup>th</sup> day of November, 2007.

A handwritten signature in black ink, reading "Karen L. Stetson", is written over a horizontal line.

Karen L. Stetson

WHEREFORE, it is respectfully requested that the motion to admit your declarant Karen L. Stetson, Pro Hac Vice, to argue or try this case in whole or in part as counsel for defendant, Timothy Mosley p/k/a Timbaland, and defendant, G Unit Records, be granted.

Respectfully submitted,

A handwritten signature in black ink, reading "Karen L. Stetson", is written over a horizontal line.

Karen L. Stetson

KAREN L. STETSON ESQ.

P.O. Box 403023

Miami Beach, Florida 33140

kls@kstetsonlaw.com

(305) 532-4845



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 742937  
Karen Linda Stetson  
P.O. Box 403023  
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on February 22, 1988.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 8<sup>th</sup> day of November, 2007.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/smrn7/R10

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EACH 1 TEACH 1, VIRGINIA BEACH MUSIC,  
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Defendants.  
-----X

07-CV-7601 (VM)

**ORDER  
ADMISSION TO PRACTICE  
PRO HAC VICE**

The motion for admission to practice Pro Hac Vice in the above captioned matter is granted. The admitted attorney, Karen L. Stetson, is permitted to argue or try this particular case in whole or in part as counsel or advocate for defendant, Timothy Mosley p/k/a Timbaland, and defendant, G-Unit Records, Inc. (incorrectly identified herein as “G Unit Records”).

An attorney admitted to practice Pro Hac Vice is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk’s Office. When paying by mail, return a copy of this Order to the Clerk’s Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court’s docket. A notation of your admission Pro Hac Vice for the above listed case will be made on the roll of attorneys.



The attorney admitted Pro Hac Vice must serve a copy of this Order on all other counsel in this case.

Dated: November \_\_\_, 2007

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Honorable Victor Marrero, USDJ

cc: Karen L. Stetson  
Court File

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X 07-CV-7601 (VM)  
SAREGAMA INDIA LTD.,

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DISTRIBUTION, INC., BLACK WALL STREET,  
EACH 1 TEACH 1, VIRGINIA BEACH MUSIC,  
WB MUSIC CORP. and DANJA HANDZ MUZICK,

## AFFIDAVIT OF SERVICE

Defendants.

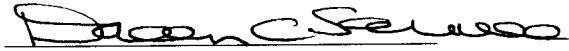
STATE OF NEW YORK)  
COUNTY OF NASSAU ) ss.:  
\_\_\_\_\_ )

DOREEN C. SAROVEC, being duly sworn, deposes and says:

I am not a party to the action, am over 18 years of age and reside at Lake Ronkonkoma, New York. On the 13<sup>th</sup> day of November, 2007, I served a true copy of the annexed Motion to Admit Counsel Pro Hac Vice, Supporting Affidavit and Declaration along with attached exhibits by first class mail, in a sealed envelope, with postage prepaid thereon, in an official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:


Seth Alan Levine  
Richman & Levine, P.C.  
666 Old Country Road  
Suite 101  
Garden City, NY 11530  
slevine@richmanlevin.com  
(516) 228-9444

Carletta F. Higginson  
Jenner & Block LLP  
919 Third Avenue, 37<sup>th</sup> Floor  
New York, New York 10022  
chigginson@jenner.com  
(212) 891-1624



Doreen C. Sarovec

Sworn to before me this  
13<sup>th</sup> day of November, 2007

  
Notary Public

CAROL LYNNE HUVAR  
NOTARY PUBLIC, State of New York  
No. 4604634  
Qualified in Suffolk County 5/31/08  
Commission Expires